

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMMUNICATIONS WORKERS OF
AMERICA, AFL-CIO,

Plaintiff,

-against-

VERIZON NEW YORK, INC., TELESECTOR
RESOURCES GROUP, INC., EMPIRE CITY
SUBWAY COMPANY (LIMITED), VERIZON
AVENUE, INC., VERIZON ADVANCED DATA
INC., AND VERIZON CORPORATE SERVICES
CORP,

Defendants.

Civil Action No.: 08-CV-0467(HB)

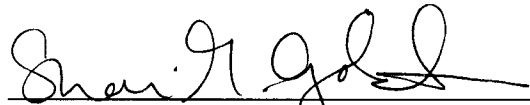
**NOTICE OF MOTION AND
MOTION FOR ADMISSION TO
PRACTICE
PRO HAC VICE**

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Shari M.

Goldsmith, sworn to on February 14, 2008, and the exhibits annexed thereto, defendants Verizon New York Inc., Telesector Resources Group, Inc., Empire City Subway Company (Limited), Verizon Avenue, Inc., Verizon Advanced Data Inc., and Verizon Corporate Services Corp. (collectively "Verizon"), will move this Court, before the Honorable Harold Baer, Jr., United States District Judge, United States District Courthouse, 500 Pearl Street, New York 10007, pursuant to Rule 1.3(c) of the Local Rules of the United States Court for the Southern and Eastern Districts of New York, for an Order allowing the pro hac vice admission of Thomas M. Beck to appear and practice before this Court as an attorney on behalf of Verizon in this civil action. There are no pending disciplinary proceedings against Attorney Beck in any State or Federal court.

Dated: New York, New York
February 14, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Shari M. Goldsmith', is written over a horizontal line.

Shari M. Goldsmith (SG-0909)
JONES DAY
222 East 41st Street
New York, NY 10017
(212) 326-3939

Attorneys for Defendants

TO: Amy S. Young
CWA Legal Department
275 Seventh Avenue, Suite 2300
New York, New York 10001

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VERIZON NEW YORK, INC., TELESECTOR
RESOURCES GROUP, INC., EMPIRE CITY
SUBWAY COMPANY (LIMITED), VERIZON
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DATA INC., AND VERIZON CORPORATE
SERVICES CORP,

Defendants.

Civil Action No.: 08-CV-0467(HB)

**AFFIDAVIT OF SHARI M.
GOLDSMITH IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE**

SHARI M. GOLDSMITH, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and an associate of Jones Day, counsel to defendants Verizon New York Inc., Telesector Resources Group, Inc., Empire City Subway Company (Limited), Verizon Avenue, Inc., Verizon Advanced Data Inc., and Verizon Corporate Services Corp. (collectively "Verizon"). I submit this affidavit in support of Verizon's application for an order granting Thomas M. Beck pro hac vice admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Verizon pursuant to Rule 1.3(c) of the Local Rules for the United States District Court for the Southern and Eastern Districts of New York.

2. Thomas M. Beck is a member of Jones Day. He was admitted to practice before the courts of the Commonwealth of Virginia and the District of Columbia on October 1, 1992 and May 14, 1993, respectively. He has been and is a member in good standing of the aforementioned bars. His Certificates of Good Standing from the Clerk of the Supreme Court of

Virginia and the Clerk of the Court of Appeals for the District of Columbia are annexed hereto as Exhibits A and B, respectively. There are no pending disciplinary proceedings against Thomas M. Beck in any State or Federal court.

3. Pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York, I request that Thomas M. Beck be permitted to participate in, argue and try the above-captioned case.

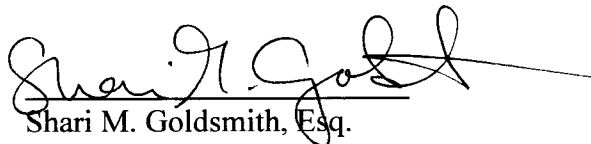
4. Because no novel issue of law is involved in this motion, I further request that this Court waive the requirement of a supporting memorandum of law pursuant to Local Civil Rule 7.1 of the United States District Court for the Southern District of New York.

5. Attached as Exhibit C is a proposed order granting this motion.

6. There has been no prior application for the relief requested herein.

WHEREFORE, it is respectfully requested that this Court grant Thomas M. Beck pro hac vice admission to the bar of this Court for the purpose of participating in, arguing and trying this case.

Dated: February 14, 2008

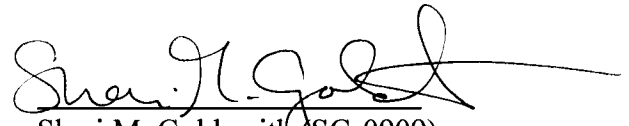

Shari M. Goldsmith, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2008, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties:

Amy S. Young
CWA Legal Department
275 Seventh Avenue, Suite 2300
New York, New York 10001

Attorneys for Plaintiff


Shari M. Goldsmith (SG-0909)
Jones Day
222 East 41st Street
New York, NY 10017-6702
smgoldsmith@jonesday.com
(212) 326-3939



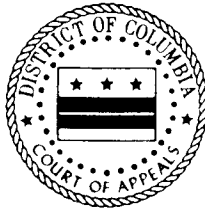
VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT **THOMAS MARTIN BECK** IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN
GOOD STANDING. **MR. BECK** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 1, 1992**, AFTER
SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued February 12, 2008

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

THOMAS M. BECK

was on the 14th day of May, 1993
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
February 11, 2008.

GARLAND PINKSTON, JR., CLERK

By: *M. Chiles*
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMMUNICATIONS WORKERS OF
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Plaintiff,

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VERIZON NEW YORK, INC., TELESECTOR
RESOURCES GROUP, INC., EMPIRE CITY
SUBWAY COMPANY (LIMITED), VERIZON
AVENUE, INC., VERIZON ADVANCED
DATA INC., AND VERIZON CORPORATE
SERVICES CORP,

Defendants.

Civil Action No.: 08-CV-0467(HB)

**[PROPOSED] ORDER GRANTING
ADMISSION TO PRACTICE
PRO HAC VICE**

AND NOW, having considered Defendants' request for *pro hac vice* admission pursuant to Local Rule 1.3(c), IT IS HEREBY ORDERED that said request is GRANTED. The admitted attorney Thomas M. Beck is permitted to appear and practice before this Court in the above-captioned case for purposes of representing Defendants.

All attorneys admitted to practice *pro hac vice* are required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fees.

This Order confirms the appearance of Thomas M. Beck as counsel for Defendants in this case, and it will be entered on the Court's docket. A notation of the admission *pro hac vice* for the above-listed case will be made on the roll of attorneys.

The attorneys admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated: New York, New York
_____, 2007

Honorable Judge Harold Baer, Jr.
United States District Judge